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March 11, 2024

Via Email to Chambers and ECF

The Honorable Jennifer H. Rearden
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

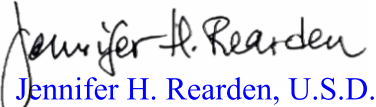
Application GRANTED. Defendant Martin Handler's change-of-plea proceeding is adjourned *sine die*.

The Court hereby adopts the proposed revised briefing schedule for all Defendants: any pretrial motions shall be filed by March 19, 2024; any responses shall be filed by April 2, 2024; and any replies shall be filed by April 9, 2024.

The Clerk of Court is directed to terminate ECF No. 230. SO ORDERED.

Re: *United States v. Martin Handler*, 23 Cr. 004 (JHR)

Dear Judge Rearden:


Jennifer H. Rearden, U.S.D.J.
Dated: March 12, 2024

On behalf of defendant Martin Handler, we respectfully submit this letter-motion to seek a short adjournment of tomorrow's scheduled plea proceedings. An unexpected development arose late this afternoon concerning plea negotiations and the parties need another few days to complete their discussions, at which time they expect to request a new date from the Court. The Government joins in this request.

In addition, because the defendants' pretrial motions are due tomorrow, March 12, 2024, Mr. Handler further respectfully requests a one-week adjournment of the schedule as follows:

- Defendants' Pretrial Motions: March 19, 2024
- Government's Responses: April 2, 2024
- Defendants' Replies: April 9, 2024

If approved by the Court, the new schedule will not interfere with the trial date or any other pretrial deadlines. This is our second request to adjourn the current motions schedule.

We have consulted with counsel for the other defendants, who join in this request. We have also consulted with the Government, which takes no position.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Mark D. Harris
Mark D. Harris
Counsel to Martin Handler

cc: All Defense Counsel
AUSA Daniel Wolf
AUSA Catherine Ghosh